

1 The Honorable Robert J. Bryan  
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9 **UNITED STATES DISTRICT COURT**  
10 **WESTERN DISTRICT OF WASHINGTON**  
11 **AT TACOMA**

12 STATE OF WASHINGTON,  
13 Plaintiff,

14 v.  
15 THE GEO GROUP, INC.,  
16 Defendant.

17 UGOCHUKWU GOODLUCK  
18 NWAUZOR, FERNANDO AGUIRRE-  
19 URBINA, individually and on behalf of  
20 all those similarly situated,

21 Plaintiffs,  
22 v.  
23 THE GEO GROUP, INC., a Florida  
24 corporation,  
25 Defendant.

26 CIVIL ACTION NO. 3:17-cv-05806-RJB

CIVIL ACTION NO. 17-cv-05769-  
RJB

PLAINTIFFS' JOINTLY PROPOSED  
VOIR DIRE

1 The State of Washington and Plaintiffs Ugochukwu Goodluck Nwauzor and Fernando  
 2 Aguirre-Urbina respectfully propose that the Court ask the following questions of the jury:

3 **Topic 1: General Questions**

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- 5 1. Have you or a close friend or family member ever been inside the Northwest Detention
- 6 Center (also known as the Northwest ICE Processing Center) in Tacoma, Washington,  
 either because you or your family or your friend worked there, were detained there, or  
 7 for any other reason?
- 8
- 9 2. Does any member of the jury panel know another panel member?
- 10 3. Does anyone need an accommodation to help you listen or sit comfortably during the  
 trial?
- 11
- 12 4. Has anyone ever been involved as a party in a legal dispute – meaning a claim or a lawsuit  
 filed by you or against you?
- 13

14 **Topic 2: Employment Background**

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- 16 5. Do you or anyone in your household own a business?
  - 17 a. If yes, did the business hire employees?
- 18 6. Have you or anyone in your household ever worked in law enforcement?
- 19 7. Have you or anyone in your household served in the military?
- 20 8. Have you or anyone in your household ever supervised employees as part of their job?
- 21 9. Have you or anyone in your household ever hired employees as part of their job?
- 22 10. Do you or anyone in your household have education, training, or experience in human  
 resource management?
- 23 11. Have you or anyone in your household ever worked a minimum wage job?
- 24

- 1 12. Have you or a close family member ever worked for a temporary agency?
- 2 13. Have you or a close family member ever worked for a restaurant or catering company?
- 3 14. Have you or a close family member ever worked as a janitor or housekeeper?

4 **Topic 3: Minimum Wage**

- 5 15. Do you think employers should be required to pay employees a minimum wage?
- 6 16. In 2016, Washington voters passed a new law that increased the state minimum wage to  
7 \$13.50 as of January 1, 2020. Do you believe this increase in the minimum wage was:  
8
  - 9 a. Too high?
  - 10 b. Too low?
  - 11 c. Appropriate?

- 12 17. Do you believe undocumented immigrants who work in Washington should be paid less  
13 than the minimum wage?

14 **Topic 4: Role of the State**

- 15 18. One of the cases here is a civil enforcement action brought by the State of Washington.  
16 Has anyone had experience with, or heard of, Washington conducting a civil enforcement  
17 action to protect Washington residents?  
18
  - 19 a. What was the matter and what did you think about it?
- 20 19. Do you think the State of Washington should be enforcing the state's minimum wage  
21 laws?  
22 20. Some people think that the State does too much meddling in the affairs of private business.  
23 Does anyone have that view—that Washington should stay out of an employer's way?

1                   **Topic 5: Immigration**

2                   21. This case will involve witnesses who are/were detained while the United States  
3                   determined their immigration status. Do you have an opinion regarding U.S. immigration  
4                   laws that would make it difficult for you to be objective in this case?  
5  
6                   22. Do any of you have a close relationship with someone who immigrated to this country?  
7  
8                   23. This case will involve witnesses who may speak languages other than English. Can you  
9                   speak a language other than English?  
10  
11                  24. Have you ever had to use an interpreter to speak with another person?  
12                   a. If so, what did you learn from the experience of using an interpreter to speak with  
13                   someone else?

14                   **Topic 7: Closing Questions**

15                  25. Does anyone have any specific beliefs or opinions about immigrants and noncitizens that  
16                  would make it difficult for you to be fair and impartial in this case, which involves  
17                  immigrants and noncitizens?  
18  
19                  26. Having heard the questions put to you by the court, does any other reason suggest itself  
20                  to you as to why you could not sit on this jury and render a fair verdict based on the  
21                  evidence presented to you and in the context of the court's instructions to you on the law?

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1 DATED this 24th day of April 2020.

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## **CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was electronically filed with the United States District Court using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

Dated this 24th day of April 2020, in Seattle, Washington.

Carla Ha

Caitilin Hall  
Legal Assistant